GREENBERG TRAURIG, LLP Robert H. Bernstein (017451982) 500 Campus Drive, Suite 400 Florham Park, New Jersey 07932 (973) 360-7946 Attorneys for Defendant Related Management Company, L.P.

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

Sira Traore and Alassane Diane, her Husband, Plaintiff,

v.

Fairview Homes Preservation LP, Bernard Freund, Related Management Company, LP, and Ricardo Mendoza,

Defendants.

D - C - . 1 - . . . .

**CIVIL ACTION** 

No. 2:20-cv-17924-CCC-ESK

NOTICE OF MOTION TO DISMISS

TO: Philip B. Vinick
7 Becker Farm Road
Suite 106
Roseland, New Jersey 07068
Attorneys for Plaintiff

PLEASE TAKE NOTICE that on Tuesday, January 19, 2021 at 9:00 A.M. or as soon thereafter as counsel may be heard, Greenberg Traurig, LLP, attorneys for Defendant Related Management Company, L.P., will move before this Court, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order, pursuant to Fed. Rule of Civ. Pro. 12(b)(6), dismissing Plaintiffs' Amended Complaint, with prejudice.

**IN SUPPORT** of this motion, Defendant shall rely on the attached Brief in Support of Motion to Dismiss and Declaration of Rebecca Holtzman, with annexed exhibits.

A proposed form of Order is also submitted.

Oral argument is requested if the motion is opposed.

GREENBERG TRAURIG, LLP Attorneys for Defendant Related Management Company, L.P.

By: /s/Robert H. Bernstein

ROBERT H. BERNSTEIN

A Member of the Firm

Dated: December 23, 2020

**CERTIFICATE OF SERVICE** 

I hereby certify that on this day, I electronically filed a true and correct copy of the foregoing Notice of Motion to Dismiss Plaintiffs' Amended Complaint, supporting Brief and Declaration of Rebecca Holtzman, with annexed exhibits, and proposed form of Order using the

CM/ECF system which will send e-mail notifications of such filing to the following attorneys of

record:

Philip B. Vinick 7 Becker Farm Road Suite 106 Roseland, New Jersey 07068 Attorneys for Plaintiff

Dated: December 23, 2020 /s/ Robert H. Bernstein

Robert H. Bernstein